



Department of Environmental Protection

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Satellite Area Accumulation of Hazardous Waste

The satellite accumulation provisions of the Massachusetts Hazardous Waste Regulations - found at 310 CMR 30.340(6), 30.351(4), and 30.353(6)(i) - give facilities that generate hazardous waste(s) the option of collecting waste(s) in satellite areas until containers are full, thus allowing these facilities more time and flexibility to meet Department of Environmental Protection (MassDEP) requirements.

Accumulation area vs. satellite points

Full containers of hazardous waste(s) must be stored in a designated accumulation area, usually separate from the area where the waste is produced.

Before being moved to the accumulation area, hazardous waste(s) may be collected at one or more satellite point(s) that are directly adjacent to process(es) that produce waste(s).

Up to 55 gallons of any one hazardous waste or up to one quart of any acutely hazardous waste may be collected at a satellite point.

Deadlines for shipping accumulated wastes

MassDEP rules require that all hazardous wastes in accumulation areas be shipped off-site for treatment or disposal within specific time periods depending on the generator's status:

- Large Quantity Generators must move each container of waste off-site no more than 90 days from the date they place it in the accumulation area. There is no volume limit.
- Small Quantity Generators must move their waste off-site no more than 180 days from the date they place it in the accumulation area, or whenever they accumulate a total of 6,000 kilograms.
- Very Small Quantity Generators may store up to 1,000 kilograms of non-acute hazardous waste in the accumulation area for any length of time.

These deadlines apply to wastes stored in the accumulation area only. There are no time limits on collection of wastes at satellite points, and satellite wastes do not affect the deadlines for shipping accumulated wastes.

Satellite accumulation requirements

Location

- The accumulation area and satellite point(s) must be separate locations on the same piece of property.
- The satellite point(s) must be directly adjacent to the process(es) that generate hazardous wastes.
- Each satellite point may use only one 55-gallon or smaller container for each hazardous waste stream, or only one 1-quart or smaller container for each acutely hazardous waste stream. Satellite accumulation in tanks is not allowed.

Waste Management

Wastes must be collected in structurally sound and compatible containers that are kept tightly closed except when adding waste. When a funnel is used to fill a satellite container, the funnel must be removed and the container tightly closed unless waste is being added. In addition, satellite containers must be:

- Labeled with the words Hazardous Waste, the name of the waste inside, and the associated hazard(s).
- Placed on impenetrable surfaces and kept separate from incompatible materials and wastes. Dikes, berms, walls, or other barriers may need to be installed.
- Inspected weekly for deterioration and leaks, and repaired or replaced if necessary.
- Marked with the date they become full as soon as they reach capacity.
- Relocated to the accumulation area within three days of becoming full. (During this three-day period, the facility may begin filling up to one new container of the same waste stream.)

Accountability

- Both the satellite point(s) and the accumulation area must be under the control of the hazardous waste generator.
- Any person directly responsible for a process that generates hazardous waste is also responsible for ensuring proper management of the adjacent satellite point(s).